

Attachment 6

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

PETER POE, et al.,

Plaintiffs,

v.

GENTNER DRUMMOND, et al.,

Defendants.

Case No. 23-cv-00177-JFH-SH

**DECLARATION OF PAULA POE IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, Paula Poe, hereby declare as follows:

1. My name for the purposes of the above-captioned action is Paula Poe, a pseudonym.¹ I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction. I have personal knowledge of the facts set forth in this Declaration and could and would testify competently to those facts if called as a witness.

2. I, along with my husband Patrick Poe, am next friend of my minor child, Peter Poe.

¹ Paula Poe, Patrick Poe, and Peter Poe are pseudonyms. My husband, my son (who is a minor), and I are proceeding under pseudonyms to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

3. I am an Oklahoma resident. I live in Cleveland County with my husband, our son Peter, who is 12 years old, and Peter's siblings.

4. Peter is intelligent, compassionate, sensitive, and very artistic. He loves to draw and paint, and to play video games.

5. My husband and I love our son, support him, and want him to be able to be himself.

6. Peter is transgender. When he was born, his sex was designated as "female," even though he is a boy.

7. Two years ago, when Peter was ten years old, Peter told us that he was not a girl, and that he did not want to be referred to using she/her pronouns.

8. We found Peter a therapist so that he could discuss these feelings.

9. My husband also called OU Children's Health, specifically the Roy G. Biv adolescent clinic, because we wanted to know more about how best to support Peter.

10. In March 2021, we met with Dr. Lawlis at OU Children's Health, who performed blood tests and took x-rays of Peter. She also referred us to a psychiatrist.

11. Eventually, my son was diagnosed with gender dysphoria.

12. In hindsight, that made sense. Throughout his childhood, Peter was never very feminine. He preferred more masculine clothing and haircuts, and would play with his shirt off.

13. While Peter was receiving therapy, and after Dr. Lawlis determined that Peter could tolerate the medication, Dr. Lawlis prescribed Lupron for Peter to stop him from getting a period.

14. Before prescribing the Lupron, Dr. Lawlis explained the risks and benefits to me and to Peter. With my support and his father's support, Peter received his first Lupron injection in May 2022, and now receives an injection every three months.

15. Peter is very upset when he is unable to receive his Lupron injections on time, because then he experiences breakthrough bleeding, which makes his gender dysphoria worse. This happened once when, because of insurance issues, there was a delay of a few weeks in receiving the injection.

16. Even with health insurance, the Lupron injections are expensive: we have a \$2,000 copay for each shot. Our whole family has cut back on other expenses to make sure that Peter can receive this medical care. Those sacrifices are worth it because Peter is more happy, excited, outgoing, and social than ever.

17. It was amazing to see how Peter bloomed once he began living as the boy that he is, and how happy he is now. He was euphoric to be who he was, a boy, and not be seen as a girl. He is much more social and outgoing.

18. Our family has been very supportive of Peter. My mother, Peter's grandmother, was especially loving and accepting of Peter as her grandson, until she passed away last year. My father, Peter's grandfather, also loves and accepts Peter for who he is. He bought Peter a birthday card addressed "to my favorite grandson." That was a very special moment for our family.

19. My family is religious, and our church has also been very accepting of Peter as our son.

20. Peter eventually wants to start taking testosterone, and to go through puberty as a boy. He is very distressed at the thought of getting a period, or growing breasts. In the weeks before his next Lupron shot is due, Peter is noticeably down.

21. This medical treatment has given Peter significant relief from his gender dysphoria. I am very concerned about Peter's mental and physical health if Peter cannot continue receiving this treatment. Peter has struggled with thoughts of suicide and self-harm before starting puberty blockers, and I am worried about his risk of suicidality and self-harm if he loses access to that care.

22. Oklahoma is my home and my family's home. We are part of a large and supportive community, and one that has been very welcoming of Peter. We do not want to leave Oklahoma, or to have to drive hours away to another state to obtain medical care for Peter. However, those may be our only options if this law goes into effect and Peter can no longer get the care he needs in Oklahoma. It is not an option for our family to not support Peter as our son, or for Peter to not be the boy that he is.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Cleveland County, Oklahoma on this 1st day of May, 2023.

A handwritten signature in black ink, appearing to read "Paula Poe", written over a horizontal line.

Paula Poe